



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

AUG 22 2016

CERTIFIED MAIL 7009 1680 0000 7647 3293
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF:

Mr. Doug Harris
Branch Manager
Veolia Technical Solutions LLC
7 Mobile Avenue
Sauget, Illinois 62201

Re: Request for Information
EPA ID No.: ILD098642424

Dear Mr. Harris:

By this letter, the U.S. Environmental Protection Agency requests information under Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. § 6927. Section 3007 authorizes the Administrator of EPA to require you to submit certain information.

This request requires Veolia Technical Solutions LLC ("VTS" or "you") to submit certain information relating to hazardous waste management at its facility located at 7 Mobile Avenue in Sauget, Illinois. We are requiring this information to determine VTS's compliance status with the manifest requirements set forth at the Illinois Administrative Code, Title 35. The enclosure specifies the information you must submit. You must submit this information within 14 calendar days of receiving this request to the United States Environmental Protection Agency, Attention: Daniel Chachakis, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

You may, under 40 C.F.R. Part 2 Subpart B, assert a business confidentiality claim covering all or part of the information in the manner described in 40 C.F.R. § 2.203(b). We will disclose the information covered by a business confidentiality claim only to the extent and by means of the procedures at 40 C.F.R. Part 2 Subpart B. You must make any request for confidentiality when you submit the information since any information not so identified may be made available to the public without further notice.

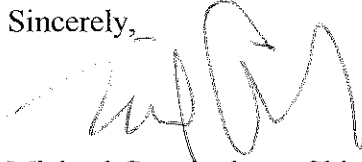
VTS must submit all requested information under an authorized signature certifying that the information is true and complete to the best of the signatory's knowledge and belief. Should the signatory find, at any time after submitting the requested information, that any portion of the submitted information is false, misleading or incomplete, the signatory should notify us. Knowingly providing false information, in response to this request, may be actionable under 18 U.S.C. §§ 1001 and 1341. We may use the requested information in an administrative, civil or criminal action.

This request is not subject to the Paperwork Reduction Act, U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

Failure to comply fully with this request for information may subject VTS to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928.

You should direct questions about this request for information to Daniel Chachakis, at (312) 886-9871, or chachakis.daniel@epa.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Michael Cunningham', written over a horizontal line.

Michael Cunningham, Chief
Compliance Section 1

Enclosure

cc: Todd Marvel, Illinois Environmental Protection Agency (todd.marvel@illinois.gov)

REQUEST FOR INFORMATION

Instructions: You must respond separately to each of the questions or requests in this attachment. Precede each answer with the number of the Request for Information to which it corresponds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds.

Requests

1. Identify all persons consulted in preparing the answers to this Request for Information. Provide the full name and title for each person identified.
2. On or about November 21, 2011, VTS shipped three containers of material, on trailer number 3834 Terminal, to Consolidated Container Corporation (Consolidated). Please provide the following information related to this shipment:
 - a. a description of the material in each container;
 - b. the quantity of material in each container;
 - c. a statement whether VTS has evaluated if the material in each container possesses any of the characteristics of a hazardous waste (i.e., ignitability, corrosivity, reactivity, and toxicity), pursuant to 35 IAC § 722.111 [40 CFR § 262.11];
 - d. if the answer to 2(c) is affirmative, true and accurate copies of all records that document the hazardous waste determination(s); and
 - e. true and accurate copies of all records (e.g., bills of lading, manifests, etc.) that document the off-site shipment of this material from VTS to Consolidated;
3. Please provide a true and accurate copy of all records Consolidated used to return each container of material referenced in request 2, above, to VTS.
4. Please provide a narrative description of the final disposition of the contents of each container referenced in request 2, above, after VTS received the material back from Consolidated. Provide true and accurate copies of all records that document the off-site shipment, if applicable, of this material.
5. On or about December 12, 2011, VTS shipped two containers of material, on trailer number 3975 Terminal, to Consolidated. Please provide the following information related to this shipment:
 - a. a description of the contents of the material in each container;

- b. the quantity of material in each container;
 - c. a statement whether VTS has evaluated if the material in each container possesses any of the characteristics of a hazardous waste (i.e., ignitability, corrosivity, reactivity, and toxicity), pursuant to 35 IAC § 722.111 [40 CFR § 262.11];
 - d. if the answer to 5(c) is affirmative, true and accurate copies of all records that document the hazardous waste determination(s); and
 - e. true and accurate copies of all records (e.g., bills of lading, manifests, etc.) that document the off-site shipment of this material from VTS to Consolidated.
6. Please provide a true and accurate copy of all records that Consolidated used to return each container of material referenced in request 5, above, to VTS.
7. Please provide a narrative description of the final disposition of the contents of each container referenced in request 5, above, after VTS received the material back from Consolidated. Provide true and accurate copies of all records that document the off-site shipment, if applicable, of this material.
8. Provide the following certification by a responsible corporate officer:

I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.